

REMARKS

The Office Action of 08/15/2007 has been carefully considered. Reconsideration in view of the foregoing amendments and the present remarks is respectfully requested.

The claims and specification have been amended to correct certain informalities noted in the Office Action. The Examiner's helpfulness in this regard is appreciated.

Claims 1-4 and 7-15 were rejected as being anticipated by Stockdale. Claims 5 and 6 were rejected as being unpatentable over Stockdale in view of Cheng. Claim 16 was rejected as being unpatentable over Stockdale in view of Lee. Claims 17-25 were rejected as being unpatentable over Stockdale in view of Lee further in view of Cheng. The claims have been amended to more clearly distinguish over the cited references. Reconsideration is respectfully requested.

In particular the claims have been amended to recite that a persistent memory is used as a *write cache memory* for a file system device. As recited in claims 1 and 10, a portion of memory, having been allocated to an application device, is allocated to a file system. As recited in claims 5 and 11, part of the memory space of the persistent memory device is allocated to a file system device as recognized by the file system device. As recited in claim 7, an executable file is written to the persistent memory device and is executed in order to transform data in the persistent memory device into a predetermined data-sequence form. The cited references are not believed to teach or suggest such combinations of features.

Stockdale, quite simply, teaches a system having a non-volatile RAM (NV-RAM) and a NV-RAM manager in which the NV-RAM manager allocates and de-allocates blocks of non-volatile memory in response to requests from "clients," i.e., gaming

software comprising one or more clients executed by a master gaming controller. Stockdale does not teach or suggest that a persistent memory is used as a *write cache memory* for a file system device. In fact, Stockdale makes no mention of a file system device (such as a disk), as acknowledged in the Office Action (page 8, line 9). Stockdale only makes mention of a file system of the non-volatile RAM itself. Accordingly, Stockdale is not believed to anticipate or render obvious the claims as amended.

Furthermore, it would not have been obvious to combine the teachings of Cheng with those of Stockdale in the manner suggested. Nor does the resulting combination teach or suggest the invention as claimed. Cheng does not teach or suggest, as recited in claims 1 and 10, a portion of memory, having been allocated to an application device, being allocated to a file system. Cheng does not teach or suggest, as recited in claims 5 and 11, part of the memory space of the persistent memory device being allocated to a file system device as recognized by the file system device. (In Cheng, the file system device has no knowledge of the presence or absence of the persistent memory device.) And neither Stockdale or Cheng teach or suggest, as recited in claim 7, an executable file being written to the persistent memory device and executed in order to transform data in the persistent memory device into a predetermined data-sequence form.

In relation to the latter point, the Office Action states "the processor can execute a compression utility, which transforms data into a predetermined data-sequence form," citing col. 7, lines 45-49 and col. 35, lines 14-20 of Stockdale. Upon closer reading, one will notice that such compression is performed "using an operating system compression utility" stored in SDRAM 325, not an executable file stored in the NV-RAM.

Accordingly, claims 1-8 and 10-25 are believed to be allowable. Withdrawal of the rejections and allowance of claims 1-8 and 10-25 is respectfully requested.

Respectfully submitted,



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